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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**THAN ZAW, INDIVIDUALLY
AND ON BEHALF OF ALL
OTHERS SIMILARLY
SITUATED,**

Plaintiff,

v.

**NELNET BUSINESS
SOLUTIONS INC.; NELNET,
INC.; and NELNET
SERVICING, LLC; and DOES 1-
100,**

Defendant.

Case No.: C 13-05788 RS

CLASS ACTION

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
JOINT MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DATE: July 31, 2014

TIME: 1:30 p.m.

COURTROOM: 3

HON. RICHARD SEEBORG

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on **July 31, 2014** at **1:30 p.m.** or as soon thereafter as the matter may be heard in **Courtroom 3** of the above captioned Court located at 450 Golden Gate Avenue, San Francisco, CA 94102, Plaintiff **THAN ZAW** (“Zaw”) and Defendant **NELNET SERVICING, LLC** (“Nelnet”) hereby jointly move the Court pursuant to Federal Rule of Civil Procedure 23 for preliminary approval of the Parties’ Class Action Settlement. Specifically, through this Motion, the Parties move jointly for certification of a settlement class; appointment of class counsel and class representatives; preliminary approval of the Parties’ proposed settlement; and, approval of the Parties’ proposed plan to provide notice to the class. This Motion is made on the following grounds:

1. The proposed Class satisfies the requirements of Rule 23 for conditional certification for settlement purposes only;
2. The proposed settlement is the product of non-collusive negotiations and is fundamentally fair, reasonable and adequate; and hence, warrants preliminary approval.

This Motion is based on the accompanying Memorandum of Points and Authorities, the exhibits attached thereto, all pleadings and papers on file in this action and upon such other matters as the Court deems proper.

Dated: June 10, 2014

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian

ABBAS KAZEROUNIAN, ESQ.
ATTORNEY FOR PLAINTIFF, THAN ZAW

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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Marc Lackner, Esq., counsel for Defendants, and that I have obtained Mr. Lackner's authorization to affix his electronic signature to this document.

KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian

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